

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DEKA INVESTMENT GMBH, <i>et al.</i> ,	§	Civil Action No. 3:15-cv-02129-K
	§	
Plaintiffs,	§	<u>CLASS ACTION</u>
	§	
vs.	§	Hon. Ed Kinkeade
	§	
SANTANDER CONSUMER USA	§	
HOLDINGS INC., <i>et al.</i> ,	§	
	§	
Defendants.	§	
	§	

**LEAD PLAINTIFFS' DESIGNATION OF EXPERT PURSUANT TO CLASS
CERTIFICATION SCHEDULING ORDER**

PLEASE TAKE NOTICE that Deka Investment GmbH and City of Dearborn Heights Act 345 Police & Fire Retirement System (together, "Lead Plaintiffs"), by and through their undersigned counsel, in accordance with this Court's Class Certification Scheduling Order, dated September 21, 2016, hereby designate as an expert Frank C. Torchio, President of Forensic Economics, Inc., who will provide opinions concerning market efficiency pertaining to the common stock of Santander Consumer USA Holdings Inc., based on his expertise, economic analysis, and the non-exhaustive factors listed in *Cammer v. Bloom*, 711 F. Supp. 1264 (D.N.J. 1989) and *Krogman v. Sterritt*, 202 F.R.D. 467 (N.D. Tex. 2001).

Dated: November 7, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2016, I served the counsel listed below via U.S. Mail and electronic mail the document entitled: **LEAD PLAINTIFFS' DESIGNATION OF EXPERT PURSUANT TO CLASS CERTIFICATION SCHEDULING ORDER.**

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/s/ Caitlin M. Moyna

Caitlin M. Moyna